

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG
RESOURCES (GUINEA) SARL, and BSG RESOURCES
LIMITED,

Plaintiffs,

v.

GEORGE SOROS, OPEN SOCIETY FOUNDATIONS,
OPEN SOCIETY INSTITUTE, FOUNDATION TO
PROMOTE OPEN SOCIETY, OPEN SOCIETY
FOUNDATION, INC., ALLIANCE FOR OPEN SOCIETY
INTERNATIONAL, INC., OPEN SOCIETY POLICY
CENTER, and OPEN SOCIETY FUND,

Defendants.

No. 1:17-cv-02726 (JFK) (AJP)

**[PROPOSED] ORDER ISSUING A LETTER ROGATORY FOR THE PRODUCTION
OF DOCUMENTS IN THE FEDERATIVE REPUBLIC OF BRAZIL**

Upon consideration of the application (the “Application”) of Defendants George Soros, Open Society Foundations, Open Society Institute, Foundation to Promote Open Society, Open Society Foundation, Inc., Alliance for Open Society International, Inc., Open Society Policy Center, and Open Society Fund, requesting the issuance of an Order by the Court for a letter rogatory requesting assistance from the appropriate judicial authority of the Federative Republic of Brazil (the “Letter Rogatory”) pursuant to Title 28 of the United States Code, Section 1781 and Federal Rule of Civil Procedure 28(b); and upon the record of these civil proceedings; and due and sufficient notice having been given under the circumstances; and it appearing that no other or further notice need be given; and after due deliberation; and it appearing that good and sufficient cause exists;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is GRANTED.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is GRANTED.
2. This Court shall sign the Letter Rogatory attached to the Application as Exhibit 2 and affix the seal of the United States District Court for the Southern District of New York over said signature in the Letter Rogatory.
3. The Clerk of the Court is directed to return the original, signed Letter Rogatory to Joseph T. Baio of Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019, so that said documents may be transmitted to the United States Department of State.
4. Joseph T. Baio of Willkie Farr & Gallagher LLP is directed to cause the transmittal of the original, signed Letter Rogatory to the United States Department of State.
5. The Court shall retain jurisdiction over any and all issues arising from or relating to the implementation and interpretation of this order.

Dated: _____, 2017
New York, New York

THE HONORABLE ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE